## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
Vs.	)	Criminal No. 04-10047 RCL
	)	
LUIS RODRIGUEZ,	)	
A/K/A "One Eyed Luis"	)	
	)	

## RODRIGUEZ'S MOTION FOR RELEASE TO THE CUSTODY OF TERESA SANTELL

The defendant, Luis Rodriguez, requests that he be sentenced to time served and released to the custody of Teresa Santell, his half-sister or, in the alternative, that he be sentenced to home detention. Ms. Santell, 30 years old, lives in Lawrence, Massachusetts with her two young children. She has expressed a willingness to let Mr. Rodriguez live with her upon his release from prison and to help him care for his epilepsy and other medical needs. The undersigned counsel informed the probation Department of Ms. Santell's desire to serve as custodian to Mr. Rodriguez and has made arrangements for Ms. Santell to be interviewed by Probation on June 27, 2006, the date of his sentencing.

## LUIS RODRIGUEZ

By his attorney,

/s/ Valerie S. Carter Valerie S. Carter Carter & Doyle LLP 530 Atlantic Avenue Boston, MA 02210 617-348-0525

DATED: June 23, 2006

## CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2006 a true copy was ECF Filed, and a copy of the above document was served upon John A. Wortmann, Assistant U.S. Attorney Joe Lyness, Probation Officer via ECF-mailing.

<u>/s/ Valerie S. Carter</u> Valerie S. Carter, Esq.